

August 11, 2010

Ms. Cynthia K. Bladey, Chief
Rulemaking, Announcements and Directives Branch
Division of Administrative Services
Office of Administration
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U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

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Subject: Response to Request for Comments Concerning Draft NUREG-0654/FEMA-REP-1, Rev. 1, Supplement 3, "Guidance for Protective Action Recommendations for General Emergencies" (Federal Register Notice 75FR10524, dated March 8, 2010)

This letter is being submitted in response to the U.S. Nuclear Regulatory Commission (NRC) request for comments concerning draft NUREG-0654/FEMA-REP-1, Revision 1, Supplement 3, "Guidance for Protective Action Recommendations for General Emergencies," which was published in the Federal Register (i.e., 75FR10524, dated March 8, 2010)

The NRC is proposing to update its protective action recommendation guidance by issuing draft NUREG-0654/FEMA-REP-1, Revision 1, Supplement 3, for public comment. The NRC has indicated that when this draft NUREG guidance is finalized, it will supersede the existing guidance contained in Supplement 3 to NUREG-0654/FEMA-REP-1, Revision 1, "Criteria for Preparation and Evaluation of Radiological Emergency Response Plans and Preparedness in Support of Nuclear Power Plants," which was issued in draft form for interim use and guidance in 1996. This updated draft guidance reflects insights the NRC gained through study of protective action strategy efficacy documented in NUREG-0653, "Review of NUREG-0654, Supplement 3, 'Criteria for Protective Action Recommendations for Severe Accidents.'"

Exelon Generation Company, LLC (Exelon) appreciates the opportunity to comment on this draft NUREG guidance.

Exelon fully supports the comments submitted by the Nuclear Energy Institute (NEI) on behalf of the industry in the NEI letter dated June 8, 2010.

If you have any questions or require additional information, please do not hesitate to contact Mr. Richard Gropp (610) 765-5557.

Respectfully,

D. P. Helker

D. P. Helker
Manager - Licensing

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